

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION

JAVIER SEGOVIA MENDIOLA, §
Plaintiff, §
vs. § CIVIL ACTION NO.: 7:22-cv-00401
KENNETH P. HARTLEY and KEVIN § JURY DEMANDED
P. HARTLEY, HARTLEY §
PRODUCE, LLC, and B & H FARMS, §
LLC §
Defendants. §

**NOTICE OF APPEARANCE AND JOINT ANNOUNCEMENT OF TENTATIVE
RESOLUTION**

I. NOTICE OF APPEARANCE

Please take notice that Ivan F. Perez and the law firm of Jones, Galligan, Key & Lozano, L.L.P., appear as counsel on behalf of Defendants Kenneth P. Hartley, Kevin P. Hartley, Hartley Produce, LLC and B&H Farms, LLC (collectively referred to as "Defendants"), in the above captioned case pending before this Court. Mr. Perez is admitted to practice in this Court.

Defendants hereby request that all notices given or required to be given in this case, and all papers served or required to be served, be served as designated below.

**II. JOINT REQUEST FOR STATUS HEARING IN LIEU OF INITIAL PRETRIAL
HEARING**

The parties have reached a tentative settlement subject to agreement upon and the execution of a settlement agreement. As a result, parties request that court retain the

scheduled Initial Pretrial and Scheduling Conference set for March 2, 2023 to serve as a status hearing in the event the parties have not filed the appropriate dismissal paperwork by that time.

III. PRAYER

WHEREFORE, PREMISES CONSIDERED, the Parties request that the Court set this matter for a Status Conference.

Respectfully submitted,

JONES, GALLIGAN, KEY & LOZANO, L.L.P.

By: /s/ Ivan F. Perez
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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I certify that on January 23, 2023, a copy of ***Notice of Appearance and Joint Announcement of Tentative Resolution*** was electronically filed using the CM/ECF system, which will automatically serve a Notice of Filing on the following attorneys:

A. Vail Kohnert-Yount
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/s/ Ivan F. Perez
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